## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: : Chapter 13

KRISTY SANTIAGO : 4/14/21 11:00 A.M.

Courtroom # 4

:

: Case No. 20-12877

## ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY

- 1. Admitted.
- 2. Admitted
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Admitted.
- 7. Denied. Debtors deny that they have failed to make the stated payments as listed and avers that Movant is holding payment(s) in abeyance without crediting their account. However, if debtors have missed any payments, they wish to enter into a stipulation allowing them to repay any post-petition arrearages through the remainder of their Chapter 13 plan.
- 8. Denied.
- 9. Denied.
- 10. Denied.
- 11. Denied

WHEREFORE, it is requested that this Honorable Court DENY and DISMISS movant's Motion for Relief from the Automatic Stay, or in the alternative approve a stipulation permitting the Debtors to become current on any missed post-petition payments.

Respectfully Submitted,

YOUNG, MARR & ASSOCIATES

By: /s/Paul H. Young

Paul H. Young, Esquire
Attorney for Debtors

3554 Hulmeville Road, Suite 102

Bensalem, PA 19020 P: 215-639-5297 F: 215-639-1344 support@ymalaw.com